

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DR. EARL JANN AND CAROL ISACSON	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 07-CV-6595
	)	
MATTHEW D. SAMPLE, J. DAVID	)	Honorable Ronald Guzman
CROSS, and SAMPLE & CROSS CAPITAL	)	
MANAGEMENT, LLC,	)	
	)	
Defendants.	)	

**JOINT RULE 26 (F) DISCOVERY PLAN**

Plaintiffs, Dr. Earl Jann and Carol Isacson, by their attorneys, submits the proposed discovery plan agreed to by the parties at a Rule 26 (f) conference:

1. Counsel for the parties met by telephone on January 16, 2008 and discussed the above titled matter, the possibility of settlement, and the scope and timing of certain discovery.
2. The parties have agreed to the following discovery plan:
  - a. The parties do not seek changes or amendments to the timing, form or manner of Rule 26(a) disclosures except as may be indicated below;
  - b. The parties shall serve their initial disclosures required by Rule 26(a)(1) on or before January 30, 2008;
  - c. The parties have agreed to complete written discovery within one hundred twenty days (on or before May 30, 2008);
  - d. The parties have agreed to complete oral discovery of fact witnesses within two hundred ten days (on or before August 31, 2008);
  - e. The parties have agreed to complete fact discovery within two hundred twenty days (on or before August 31, 2008);

- f. Plaintiffs have agreed to make their expert witness disclosures thirty days after close of fact discovery (on or before October 1, 2008);
  - g. Defendants have agreed to make their expert witness disclosures forty-five days thereafter (on or November 15, 2008);
  - h. The parties have agreed to complete expert discovery on or before December 15, 2008;
  - i. The parties believe that discovery will be needed regarding the investment advisory services that the defendants provided on the plaintiffs' behalf, including the appropriateness of their advice in light of the plaintiffs' respective ages, net worth and work status. The defendants intend to take discovery regarding the nature and extent of the plaintiffs' experience in options trading, including serving subpoenas for records from third parties regarding this subject and concerning the facts relating to the plaintiffs' allegations;
  - j. The parties have agreed to preserve all emails and/or any other electronically stored information or data regarding this matter.
  - k. The parties have agreed to provide privilege logs for all documents withheld based on the claim of privilege except for documents between the parties and counsel who have appeared in the instant matter and the work product of such counsel.
  - l. The parties do not believe that changes will be needed regarding discovery limitations under the Federal Rules.
3. The foregoing initial plan has been reviewed and agreed to by all parties to this action.

Respectfully submitted,

EARL JANN AND CAROL ISACSON,

By: s/Mitch Katten  
One of their Attorneys

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